

EXHIBIT Z

EXHIBIT Z

Brad Kuhlman

From: Chad Lucas
Sent: Tuesday, January 03, 2012 1:30 PM
To: Brad Kuhlman (brad@kuhlman-law.com)
Subject: FW: Averbukh dismissal
Attachments: Mardock and Thornton.111024.pdf

Here's the email chain re the dismissal

From: Chad Lucas
Sent: Tuesday, October 25, 2011 11:11 AM
To: 'David Weinstein'; Brad Kuhlman; Marsha.Samuels@SA-Trial.com; kmallahan@wmwlawfirm.com
Cc: Greg Hopper; 'Patricia M. Thornton'; Katheryne Worley; EGray@eckertseamans.com; JOley@eckertseamans.com; 'ljupka@kuhlman-law.com (Ljupka@kuhlman-law.com)'
Subject: RE: Averbukh dismissal

David:

I'm assuming your email is referring to our disagreement about whether Alla should be included on the stipulation of dismissal. Attached is the letter and signed stipulation we mailed out yesterday. As I stated in the letter, the order directs the "Averbukhs" to dismiss the state court action. The order defines the Averbukhs as "Vladimir Averbukh, individually and as personal representative of Boris Averbukh's estate, and Aleksander Averbukh." That definition does not include Alla. I readily admit I'm not the smartest person in the world, but I don't follow the logic in having someone stipulate to the dismissal of a claim that hasn't been asserted. Maybe Alla's attorneys see it differently. I can tell you our clients are ready and willing to stipulate to the dismissal of their claims against Delphi per Judge Drain's order and are willing to work with you to get this done. I will be around all day if you want to meet and confer.

Thanks.

Chad C. Lucas
The Kuhlman Law Firm, LLC
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Kansas City, Missouri 64105
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Facsimile: (816) 799-0336
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From: David Weinstein [<mailto:david.weinstein@wtllaw.com>]
Sent: Tuesday, October 25, 2011 10:44 AM
To: Chad Lucas; Brad Kuhlman; Marsha.Samuels@SA-Trial.com; kmallahan@wmwlawfirm.com
Cc: Greg Hopper; 'Patricia M. Thornton'; Katheryne Worley; EGray@eckertseamans.com; JOley@eckertseamans.com
Subject: RE: Averbukh dismissal
Importance: High

Chad and Brad,

Katheryne Worley is out of the office today. DPH/Delphi needs quickly to understand the basis for your refusal to sign the attached dismissal stipulation as proposed. Judge Drain's Oct 4, 2011 order (attached) is clear. By copy of this to Alla Averbukh's counsel Ms. Samuels and Mr. Mallahan, we are asking for their immediate input, as well. **We all need to talk today (as a meet-and-confer), if at all possible.** An apparent violation on a U.S. judge's order will not be taken lightly. We look forward to your response – and those of Ms. Samuels and Mr. Mallahan -- before the end of today. Thanks.

- David B. Weinstein

David B. Weinstein
Weinstein Tippetts & Little LLP
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Fax (713) 244-0801
david.weinstein@wtllaw.com

From: Katheryne Worley
Sent: Wednesday, October 19, 2011 10:18 AM
To: 'Chad Lucas'
Cc: brad@kuhlman-law.com; Greg Hopper; 'Patricia M. Thornton'; David Weinstein
Subject: RE: Averbukh dismissal

Chad,

Taking into account the wording of the Original Complaint and the Bankruptcy Court's Order, we believe all the Averbukhs will need to sign the stipulation. We request the stipulation to be signed as we have revised as it is consistent with the Judge Robert Drain's October 4, 2011 order.

Katheryne

Katheryne R. Worley
(formerly MarDock)

Weinstein Tippetts & Little, LLP
7660 Woodway, Suite 500
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Ph 713.244.0806
Fax: 713.244.0801
katheryne.worley@wtllaw.com

From: Chad Lucas [<mailto:chad@kuhlman-law.com>]
Sent: Tuesday, October 11, 2011 9:02 AM

To: Katheryne Worley
Cc: brad@kuhlman-law.com; Greg Hopper
Subject: RE: Averbukh dismissal

Katheryne:

This is fine except for Alla should be taken out. She hasn't asserted any claims against the Delphi defendants in the case, so she doesn't have anything to dismiss.

Chad

From: Katheryne Worley [<mailto:katheryne.worley@wtllaw.com>]
Sent: Monday, October 10, 2011 5:06 PM
To: Chad Lucas; David Weinstein
Cc: Brad Kuhlman; Greg Hopper; Ljupka Lefkova; 'Patricia M. Thornton'
Subject: RE: Averbukh dismissal

Chad,

We propose the attached red-lined changes to the dismissal stipulation. Please let us know if these are acceptable to you. Thanks.

Katheryne

From: Chad Lucas [<mailto:chad@kuhlman-law.com>]
Sent: Thursday, October 06, 2011 1:45 PM
To: Katheryne Worley; David Weinstein
Cc: brad@kuhlman-law.com; Greg Hopper; Ljupka@kuhlman-law.com
Subject: Averbukh dismissal

Katheryne and David:

Attached is a stipulation of dismissal for the Delphi defendants per the bankruptcy Court's recent order. Please take a look at the form and let me know if you have any changes. If not, please sign and return to us and we will get it filed.

Chad C. Lucas
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KUHLMAN LAW FIRM, LLC

ATTORNEYS AT LAW

BRADLEY D. KUHLMAN
CHAD C. LUCAS

October 24, 2011

Katheryne MarDock
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Patricia M. Thornton
Bacon, Thorton & Palmer, L.L.P.
6411 Ivy Lane, Suite 706
Greenbelt, Maryland 20770

RE: *Averbukh v. Enterprise RAC Company of Maryland, LLC, et al.*
Delphi defendant dismissal

Dear Counsel:

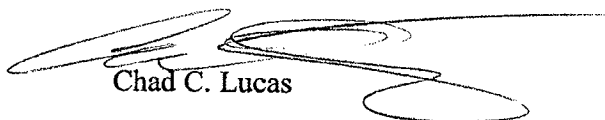
On October 4, 2011 Judge Drain entered an order ordering and directing "the Averbukhs" to "immediately dismiss with prejudice the State Court Action" against the Delphi defendants. In the first paragraph of Judge Drain's order, the "Averbukhs" are defined as "Vladimir Averbukh, individually and as personal representative of Boris Averbukh's estate, and Aleksander Averbukh."

Pursuant to Judge Drain's October 4th order, enclosed please find a signed Stipulation of Dismissal with Prejudice on behalf of Vladimir and Aleksandr Averbukh of the claims asserted against the Delphi defendants. Please sign where indicated and return to me at your earliest convenience and we will file it with the Court.

Feel free to call me if you have any questions.

Very truly yours,

THE KUHLMAN LAW FIRM, LLC



Chad C. Lucas

CCL:lzl
Enclosure

1100 Main Street ♦ Suite 2550 ♦ Kansas City, Missouri 64105

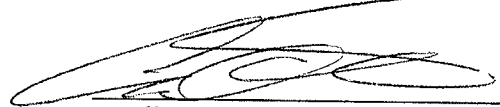
Telephone 816.799.0330 ♦ Facsimile 816.799.0336 ♦ www.kuhlman-law.com

VLADIMIR AVERBUKH, et al. Plaintiffs v. ENTERPRISE RAC COMPANY OF MARYLAND, LLC, et al. Defendants	IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY Case No. 09-35924
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STIPULATION OF DISMISSAL WITH PREJUDICE

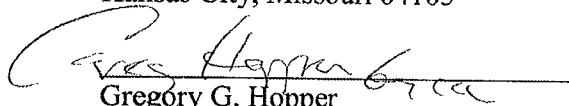
Dear Clerk:

Plaintiffs, Vladimir Averbukh and Aleksandr Averbukh, hereby stipulate to the dismissal of all claims and causes of action against Defendants, DPH Holdings Corporation (formerly known as Delphi Corporation) and DPH-DAS, LLC (formerly known as Delphi Automotive Systems, LLC), with prejudice in the above referenced matter.



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**Attorneys for Plaintiffs
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**Attorneys for Defendants Delphi
Corporation n/k/a DPH Holdings
Corporation and Delphi Automotive
Systems, LLC**

Certificate of Service

I hereby certify that a copy of the above and foregoing was sent via U.S. Mail, postage prepaid, on this 24th day of October, 2011 to:

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